

ORIGINAL

**In the supreme court of Ohio**

15-0076

Pauletta Higgins

5245 cinderlane Parkway

Orlando FL 32808

Vs

Hamilton county dept cps

222 E. Central Parkway

Cincinnati OH 45202

*Hamilton County Sevenille  
Court*  
Brenda Anthony

800 Broadway

Cincinnati OH 45202

Marjorie Davis

800 Broadway

Cincinnati Ohio

Mark Fider

810 sycamore

Cincinnati Oh 45202

Jon Sinclair

3536 Edwards rd

Cincinnati Ohio

First district Court of appeals

Peope cummingham

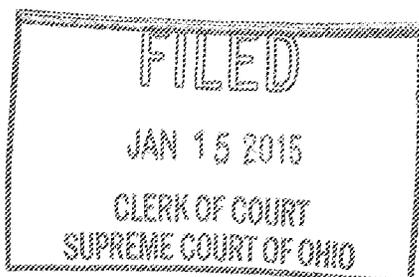
230 E. ninth st

Cincinnati Oh 45202

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**Emergency Extraordinary writ Motion to Compel**

**(Discovery & to turn over edvidence)**



Pauletta N. Higgins

5245 Cinderlane Parkway 383

Orlando Fl 32810

**Primary statement**

1.) Now comes realtor Pauletta Higgins and seek for discovery to show probable cause. I demand Hamilton county Cps to show cause from June 2013 to present specifying and showing evidence why agency is committing a discriminatory tort and hold my child against mother will if there was never no abuse or neglect ever presented in case F062497 and up until today. What is the probable cause as of today?? What is my child an adjudicated dependent based off of?? According to R.C 2151 (if it not racial entities)

2.) Realtor seek for discovery/evidence on judge people cummingham of why my constitutional right under the due process clause to appeal was denied/violated why wasn't I given a opportunity to present my case as a prose applicant including my motion for reconsiderations etal....noting there was multiple judgements and claims related to my case

3.) Realtor seek discovery/evidence from Mark Fider when he had information (calling Ericka Dority and I to his office for a meeting) regarding his Client Pauletta Higgins case plan noting it was not signed off as of yet and her child was placed with a abusive relative against her will why did he misrepresent his client and failed to comply after he notice magistrate Anthony was gone for the day

4.) realtor seeks discover/evidence from Jon Sinclair of why he failed to get the requested 241 kids call that I made to child service than conspired with the state of forcing my child to stay and Ohio so they can gain jurisdiction illegally to proceed and make ruling of custody and visitation notion Ohio was not my child homestate and Ohio never had personal or subject matter jurisdiction Jon sin new willing and convince that we was in a court that suppose to be ruling in the best interest of my child noting my child was in grade school had friend was under doctor care and much more) I seek jon Sinclair to show probable cause to show why he thought this was in the best of my child and why I was represent to high/equal standers!!!

5.) Realtor Pauletta Higgins seeks discovery/evidence to show probable why my child was held with no basis to the law from July to November 2013. Why mother wasn't giving a hearing before you signed off on case plan when agency place my child with a abusive relatives against my will noting the severity of the abusive family reuniting the Higgins from 1984 to present ( noting she had me as child). Also on Nov 7<sup>th</sup> show probable cause why magistrate anything made a racial comment on the record when she removed my child out his home a second time "two people and the same house hold with similar mental health" Anthony then created Zyvaunte to go back to his foster base on race note Z.H was always in treatment for his health. what was the probable cause for u removing my child out his home if the racial comment you made wasn't base off race. I also demand Jon Sinclair to turn over discovery regarding this case since he was present on my behalf regarding this matter. ( I told Magistrate anything in the hearing on Nov. 7<sup>th</sup> 13 Z.h was already and treatment so there no need for you to move him out his home magister Anthony state sh do not no that prosecutor got records and what I was saying all along was true child records was subpoena to match what I was say) base on the comment

about race anthoy used her judge power and removed out his home a second time causing phscological stress and abuse toward my child and I up until today.

Realtor Pauletta Higgins seek discover/edvidence from Marjorie davis of why she went up to my child school the day before he was suppose to come home and all of a sudden zyvaunte hade a phycological attack and police was call and taken to cinti children hospital physh ward Marjorie was so quick to filed the motion to removed my child back befor mag anthong on nov. 7<sup>th</sup> 2013 and the only one to filed January 2014 marjorie told the school to not allow me into my child school meeting base on my disability and what whas exacty done magistrate Anthony grant this motion cause it was a public place and I had every right to be in my child's school meeting

**Respectfully submitted**

### **Conclusion**

I have been fighting and unruly and racial case with the juvenillt withing a years time and getting pentize for my causable action court I have been fighting to the best of my ability to get it resovele approalyt however with me been under constat attack my reaction spoke faster than words my heath and curtly in jeoparpery and I seek relief from this court noting the first district court of appael have refuse to hear my case mulitpy times as well as juvenile court. Ohio is Desperly obsessed with my Child to want to hold him agaist a mother's will and the child's Original Home State (Orlando fl)

**Certificate of service**

I certify that on this 13<sup>th</sup> day of January 2015 listed defendants was served U.S regular  
mail.

Pauletta N. Higgins

5245 Cinderlane Parkway 383

Orlando Fl 32810

3522102884

[Pauletahiggins88@gmail.com](mailto:Pauletahiggins88@gmail.com)

# Affidavit of Support

Supreme Court of Ohio

I certify under penalties of perjury that all information listed in this complaint is true and correct to the best of my ability

*Paula Huggins*

*Paula Huggins*  
PO Box 3063  
Orlando FL  
32801

Chanelle Fuller  
Notary Public, District of Columbia  
My Commission Expires 6/14/2015

District of Columbia: SS  
Subscribed and Sworn to before me,  
this 5 day of December, 2014

*[Signature]*

Notary Public, D.C.  
My commission expires 6/14/2015

# Affidavit of Indigety

In the Supreme Court of Ohio

I request respectfully for this Court to waived the filing fee of this motion base on facts of:

- Social Security I received
- Checking account & balance

*Paulita Hynes*  
Paulita Hynes  
P. O. Box 3063  
Orlando FL  
32801

District of Columbia: SS  
Subscribed and Sworn to before me,  
this 5 day of December, 2014  
  
Notary Public, D.C.  
My commission expires 6/14/2015

Chanele Fuller  
Notary Public, District of Columbia  
My Commission Expires 6/14/2015